

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ANTONIO DE LA VEGA MAURI  
ZAYMELI ROSELIA ROMAN VELAZQUEZ  
(DEBTORS)

CASE NO. 11-00239 BKT

CHAPTER 13

AMENDED PLAN DATED 10/13/2011

TO THE HONORABLE COURT:

Comes now Debtor (s), represented by the undersigned attorney, and represents as follows:

1. Debtor (s) informs the filing of Amended Plan dated 10/13/2011;

- i. To provide the necessary funding to pay claim #4 in full. To that effect, the last step payment (from month 51 to month 60) were increased by the amount of \$100.00.
  - ii. The Debtor submits that the amended plan complies with the liquidation value of the case, since the IRS priority claim is paid an amount greater than the liquidation value determined.

WHEREFORE, Debtor (s) prays from this Honorable Court to take notice and allow filing of the amended plan.

**NOTICE:** Within twenty eight (28) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all CM/ECF participants in this case, including: U.S. Trustee, and to the Assistant U.S. Trustee. Furthermore, I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the attached master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, October 13, 2011.

s/JOSE L. JIMENEZ QUINONES  
José L. Jiménez Quiñones, Esq.  
USDCPR 203808  
268 AVE. PONCE DE LEON  
Suite 1118  
San Juan, P.R. 00918-2007  
TEL: 787-282-9009  
FAX: 787-282-9009  
jljimenez11@gmail.com

**United States Bankruptcy Court  
District of Puerto Rico**

**IN RE:**

Case No. 11-00239

**DE LA VEGA MAURI, ANTONIO & ROMAN VELAZQUEZ, ZAYMELI ROSELIA**

Debtor(s)

Chapter 13

**AMENDED CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<p>PLAN DATED: _____</p> <p><input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION</p>	<p><input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>10/04/2011</u></p> <p>Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other</p>																																				
<p><b>I. PAYMENT PLAN SCHEDULE</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">\$</td> <td style="width: 15%;"><u>700.00</u></td> <td style="width: 15%;"><u>x</u></td> <td style="width: 15%;"><u>12</u></td> <td style="width: 15%;"><u>= \$</u></td> <td style="width: 15%;"><u>8,400.00</u></td> </tr> <tr> <td>\$</td> <td><u>900.00</u></td> <td><u>x</u></td> <td><u>12</u></td> <td><u>= \$</u></td> <td><u>10,800.00</u></td> </tr> <tr> <td>\$</td> <td><u>1,000.00</u></td> <td><u>x</u></td> <td><u>12</u></td> <td><u>= \$</u></td> <td><u>12,000.00</u></td> </tr> <tr> <td>\$</td> <td><u>1,100.00</u></td> <td><u>x</u></td> <td><u>14</u></td> <td><u>= \$</u></td> <td><u>15,400.00</u></td> </tr> <tr> <td>\$</td> <td><u>1,200.00</u></td> <td><u>x</u></td> <td><u>10</u></td> <td><u>= \$</u></td> <td><u>12,000.00</u></td> </tr> <tr> <td colspan="6" style="text-align: center;">TOTAL: \$ <u>58,600.00</u></td> </tr> </table> <p>Additional Payments: \$ <u>14,360.00</u> to be paid as a LUMP SUM within <u>56 months</u> with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input checked="" type="checkbox"/> Other: <b>\$2,060 FOR THE 1st YEAR AND \$3,075 FOR SUBSEQUENT 4 YEARS FROM INCOME TAX REFUNDS, CHRISTMAS BONUS AND 2nd JOB.</b></p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>72,960.00</u></p> <p><b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>1,824.73</u></p> <p>Signed: <u>/s/ ANTONIO DE LA VEGA MAURI</u> Debtor</p> <p><u>/s/ ZAYMELI ROSELIA ROMAN VELAZQUEZ</u> Joint Debtor</p>		\$	<u>700.00</u>	<u>x</u>	<u>12</u>	<u>= \$</u>	<u>8,400.00</u>	\$	<u>900.00</u>	<u>x</u>	<u>12</u>	<u>= \$</u>	<u>10,800.00</u>	\$	<u>1,000.00</u>	<u>x</u>	<u>12</u>	<u>= \$</u>	<u>12,000.00</u>	\$	<u>1,100.00</u>	<u>x</u>	<u>14</u>	<u>= \$</u>	<u>15,400.00</u>	\$	<u>1,200.00</u>	<u>x</u>	<u>10</u>	<u>= \$</u>	<u>12,000.00</u>	TOTAL: \$ <u>58,600.00</u>					
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<p><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <b>RNPM, LLC</b> Cr. _____ Cr. _____ # <b>1317409</b> # _____ # _____ \$ <b>33,476.66</b> \$ _____ \$ _____</li> <li>2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <b>CRIM</b> Cr. <b>RNPM, LLC</b> Cr. _____ # <b>89975</b> # <b>POC #4</b> # _____ \$ <b>411.74</b> \$ <b>24,500.00</b> \$ _____</li> <li>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</li> <li>4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <b>AA CREDIT UNION</b></li> <li>5. <input type="checkbox"/> Other:</li> <li>6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>RNPM, LLC</b></li> </ol> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> <li>1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</li> <li>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</li> </ol> <p>OTHER PROVISIONS: (Executive contracts; payment of interest to unsecureds, etc.) See Continuation Sheet</p>																																					

Attorney for Debtor **JIMENEZ - QUINONES LAW OFFICES**

Phone: **(787) 282-9009**

AMENDED CHAPTER 13 PAYMENT PLAN

Debtor(s)

**AMENDED CHAPTER 13 PAYMENT PLAN**

Continuation Sheet - Page 1 of 1

1. INCOME TAX REFUNDS: TAX REFUNDS WILL BE DEVOTED EACH YEAR, AS PERIODIC PAYMENTS, TO FUND THE PLAN UNTIL COMPLETION. THE TENDER OF SUCH PERIODIC PAYMENTS SHALL DEEM THE PLAN MODIFIED BY SUCH AMOUNT, WITHOUT THE NEED OF FURTHER NOTICE, HEARING OR COURT ORDER. MAY DEBTOR(S) NEED TO USE A PORTION OF SAID REFUND, PRIOR AUTHORIZATION OF THE COURT SHALL BE SOUGHT BY DEBTOR(S).
2. PRE-CONFIRMATION ADEQUATE PROTECTION PAYMENTS OF \$500 PER MONTH SHALL BE PAID TO RNPM, LLC., c/o OPERATING PARTNERS --TO: PO BOX 194499, SAN JUAN, PR 00919-4499-- ON ACCOUNT OF THE RESIDENTIAL MORTGAGE LOAN, FOR THE FIRST SIX (6) MONTHS PAYABLE UNDER THE PLAN, OR UP TO THE DATE OF CONFIRMATION OF THE PLAN, IF EXTENDED BEYOND SIX MONTHS.
3. DEBTOR WIL SURRENDER THE MOTOR VEHICLE (CLAIM #10-1) TO AA CREDIT UNION.
4. PRE CONFIRMATION ADEQUATE PROTECTION PAYMENTS OF \$125 PER MONTH AMOUNTING TO \$500.00 WERE PAID BY THE TRUSTEE TO AMERICAN AIRLINES ("AA") FEDERAL CREDIT UNION --TO: MD2100 PO BOX 619001, DFW AIRPORT, TX 75261-9001-- BEFORE SURRENDERING THE COLLATERAL/VEHICLE TO SAID CREDITOR.

**TWENTY-EIGHT-DAY NOTICE TO PARTIES IN INTEREST:**

WITHIN TWENTY EIGHT (28) DAYS AFTER SERVICE AS EVIDENCED BY THE CERTIFICATION, AND AN ADDITIONAL THREE (3) DAYS PURSUANT TO FED. R. BANK. P. 9006(F) IF YOU WERE SERVED BY MAIL, ANY PARTY AGAINST WHOM THIS PAPER HAS BEEN SERVED, OR ANY OTHER PARTY TO THE ACTION WHO OBJECTS TO THE RELIEF SOUGHT HEREIN, SHALL SERVE AND FILE AN OBJECTION OR OTHER APPROPRIATE RESPONSE TO THE AFOREMENTIONED AMENDED PLAN WITH THE CLERK'S OFFICE OF THE U.S. BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO. IF NO OBJECTION OR OTHER RESPONSE IS FILED WITHIN THE TIME ALLOWED HEREIN, THE PAPER WILL BE DEEMED UNOPPOSED AND MAY BE GRANTED UNLESS: (I) THE REQUESTED RELIEF IS FORBIDDEN BY LAW; (II) THE REQUESTED RELIEF IS AGAINST PUBLIC POLICY; OR (III) IN THE OPINION OF THE COURT, THE INTEREST OF JUSTICE REQUIRES OTHERWISE. FED. R. BANKR. P. 2002 (B) AND LBR 9013-1.

Label Matrix for local noticing  
0104-3  
Case 11-00239-BKT13  
District of Puerto Rico  
Old San Juan  
Thu Oct 13 17:09:48 AST 2011

AA CREDIT UNION  
P.O. BOX 155489  
FT. WORTH, TX 76155-0489

OPERATING PARTNERS CO INC  
O'NEILL & GILMORE  
CITIBANK TOWER SUITE 1701  
252 AVE PONCE DE LEON  
SAN JUAN, PR 00918-2001

AA CREDIT UNION  
P.O. BOX 30116  
TAMPA, FL 33630-3116

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BANK OF AMERICA  
PO BOX 15019  
WILMINGTON, DE 19886-5019

CCB CREDIT SERVICES  
PO BOX 272  
SPRINGFIELD, IL 62705-0272

ACADEMY COLLECTION SERVICES INC  
10965 DECATUR ROAD  
PHILADELPHIA, PA 19154-3210

CMPR INC  
726 EXCHANGE STREET, SUITE 700  
BUFFALO, NY 14210-1464

CR EVERGREEN, LLC  
MS 550  
SEATTLE, WA 98111-9221

CITIFINANCIAL RETAIL SERVICES  
P.O. BOX 22066  
TEMPE, AZ 85285-2066

CRIM  
P.O. BOX 195387  
SAN JUAN, PR 00919-5387

DEPTO. DE HACIENDA  
DEPARTMENT OF TREASURY  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

Department of Treasury-  
Bankruptcy Section (Suite 1504)  
235 Ave. Arterial Hostos  
San Juan Puerto Rico 00918-1451

EASTERN AMERICA INSURANCE CO  
PO BOX 9023862  
SAN JUAN, PR 00902-3862

FIA CARD SERVICES  
P.O. BOX 15019  
WILMINGTON, DE 19886-5019

FIA CARD SERVICES, N.A.  
c/o PRA RECEIVABLES MANAGEMENT LLC  
PO BOX 12907  
Norfolk, VA 23541-0907

FIRST BANK  
P.O. BOX 9146  
SAN JUAN, PR 00908-0146

FIRST PREMIER BANK  
PO BOX 5524  
SIOUX CITY FALLS, SD 57117-5524

FIRSTLEASING  
PO BOX 11852  
SAN JUAN, PR 00910-3852

FRANCISCO FERNANDEZ CHIQUES  
PO BOX 9749  
SAN JUAN, PR 00908-0749

GAP  
PO BOX 530942  
ATLANTA, GA 30353-0942

GE MONEY BANK  
PO BOX 960061  
ORLANDO, FL 32896-0061

INTERNAL REVENUE SERVICES  
CITY VIEW PLAZA II  
48 CARR 165 STE 2000  
GUAYNABO, PR 00968-8000

(p) INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

LEADING EDGE RECOVERY SOLUTIONS  
PO BOX 129  
LINDEN, MI 48451-0129

OPERATING PARTNERS, CO., INC.  
AMERICAN INTERNARIONAL PLAZA BUILDING  
250 MUNOZ RIVERA, SUITE 1200  
SAN JUAN, PR 00918-1814

PR ACQUISITIONS LC  
250 AVE MUNOZ RIVERA STE 1200  
SAN JUAN, PR 00918-1814

PREMIER BANKCARD CHARTER  
PO BOX 2208  
VACAVILLE, CA 95696-8208

(p) PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

RNPM, LLC  
C/O OPERATING PARTNERS, CO. INC.  
P.O. BOX 194499  
SAN JUAN, PR 00919-4499

ROOMS TO GO  
C/O HRS USA  
P.O. BOX 60107  
CITY OF INDUSTRY, CA 91716-0107

SECURITY CREDIT SERVICES  
2623 W OXFORD LOOP  
OXFORD, MA 38655-5442

TREASURY SECRETARY  
DEPARTAMENTO DE HACIENDA  
P.O. BOX 9024140  
SAN JUAN, PR 00902-4140

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

ANTONIO DE LA VEGA MAURI  
URB. LOS FAROLES  
500 CARR 861 APT 134  
BAYAMON, PR 00956-9323

JOSE L JIMENEZ QUINONES  
JIMENEZ QUINONES LAW OFFICE, PSC  
268 AVE. PONCE DE LEON  
SUITE 1118  
SAN JUAN, PR 00918-2007

MONSITA LECAROZ ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

ZAYMELI ROSELIA ROMAN VELAZQUEZ  
URB. LOS FAROLES  
500 CARR 861 APT 134  
BAYAMON, PR 00956-9323

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

INTERNAL REVENUE SERVICES  
P.O. BOX 16236  
PHILADELPHIA, PA 19114-0236

Portfolio Recovery Associates, LLC  
POB 12914  
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) ACADEMY COLLECTION SERVICES INC  
10965 DECATUR ROAD,  
PHILADELPHIA, PA 19154-3210

(d) CRIM  
PO BOX 195387  
SAN JUAN, PR 00919-5387

(d) CRIM  
PO BOX 195387  
SAN JUAN, PR 00919-5387

(d) Premier Bankcard/Charter  
P.O. Box 2208  
Vacaville, CA 95696-8208

End of Label Matrix	
Mailable recipients	39
Bypassed recipients	4
Total	43